



MEMO ENDORSED

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March 16, 2022

Via ECF and email  
Hon. Sidney H. Stein  
U.S. District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: U.S. v Young, et. al., (Barbaro Bonilla)  
21 Cr. 486 (SHS)

Dear Judge Stein:

I represent Barbaro Bonilla in the above matter, and I write to respectfully request a slight modification in his bail in light of the pretrial conference scheduled for tomorrow, March 16, 2022 at 4:30 pm. Mr. Bonilla was released on bail with the condition that he reside with his sister in Plattsburgh, NY. He will be driving to the pretrial conference tomorrow from Plattsburgh and he anticipates that the drive will be at least 5 hours. Prior to driving back, and following the conference, Mr. Bonilla is seeking permission to rest at a Manhattan hotel. He anticipates being back on the road by 11 pm. Mr. Bonilla's Pretrial Service Officer Bill Parker has no objection to this request, as long as he advises Mr. Parker of where he will be resting. The Government, per AUSA Jun Xiang has advised that they defer to Pretrial.

Your Honor's time and consideration of this request is greatly appreciated.

Respectfully submitted:

s/

Lorraine Gauli-Rufo

Attorney for Barbaro Bonilla

cc: Jun Xiang, AUSA  
Sarah Mortazavi, AUSA  
Defense Counsel of Record

3/15/2022  
Defendant is welcome and entitled to be present on 3/16 at 4:30 p.m. but the court perceives no necessity for him to have to travel so far for this status conference. If Ms. Crunk-Rufo wishes to waive his appearance, she may do so. Def. may also call in by telephone. So ordered  
Sidney H. Stein  
USDC